

## **Remarks**

Applicants respectfully request reconsideration of this application as amended.

Claims 1-6, 8-11, 16 and 18-22 have been amended. Claims 27-30 have been cancelled.

Therefore, claims 1-11 and 16-22 are presented for examination.

Applicants reaffirm election of claims 1-11, 16-22 and 27-30 for prosecution of the present application.

The information disclosure statement filed July 11, 2002 failed to comply with 37 CFR 1.98(a)(2). A copy of each publication listed is enclosed herewith.

Claims 1-4, 16-20 and 27-29 stand rejected under 35 U.S.C. §102(e) as being anticipated by Larson et al. (U.S.2003/0033547). In addition, claims 6-10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Larson. Applicants submit that the present claims are patentable over Larson.

Larson discloses a server system including a plurality of subsystems including an associated memory for storing power usage information. A power supply unit is coupled to the plurality of subsystems to provide power to the plurality of subsystems. A server management card is coupled to the plurality of subsystems, and is configured to retrieve the power usage information from the memory of each subsystem. The server management card is configured to calculate the total power usage of the plurality of subsystems based on the retrieved power usage information. See Larson at paragraph [0004].

Claim 1 of the present application recites a first management bus type specific to couple only to field replaceable units having a first type, and a central management agent to monitor a first set of field replaceable units and transmit signals to control each of the first set of field replaceable units. Applicants submit that nowhere in Larson is there disclosed or

suggested a management bus type specific to couple only to field replaceable units having a first type. Instead, Larson discloses various I<sup>2</sup>C busses coupled to various component types. Moreover, Larson does not disclose or suggest a central management agent that transmits signals to control devices coupled to the I<sup>2</sup>C busses. Larson discloses a server management card that receives power usage information from the memory of each subsystem and calculates the total power usage of the plurality of subsystems based on the retrieved power usage information. However, such functionality is not equivalent to transmitting signals to control devices. Thus, for the reasons described above, claim 1 is patentable over Larson.

Claims 2-5 depend from claim 1 and include additional features. As a result, claims 2-5 are also patentable over Larson.

Claim 6 recites a first management bus type specific to couple only to field replaceable units having a first type, and a central management agent to monitor and transmit signals to each of the first set of field replaceable units and the second set of field replaceable units. Therefore, for the reasons described above, claim 6 is also patentable over Larson. Because claims 7-11 depend from claim 6 and include additional features, claims 7-11 are also patentable over Larson.

Claim 16 recites a management bus coupled to one or more fan trays and a central management agent to transmit signals to control activation of the one or more fan trays based upon signals received from one or more temperature sensors. Thus, for the reasons described above, claim 16 is also patentable over Larson. Since claims 17-22 depend from claim 16 and include additional features, claims 17-22 are also patentable over Larson.

Claims 5, 11 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Larson et al. in view of Carlson et al. (U.S. Patent No. 5,544,304). Applicants submit that the present claims are patentable over Larson even in view of Carlson.

Carlson discloses a method and apparatus for reducing the overhead required in conventional fault tolerant processing by redundant processors. See Carlson at Abstract. Nonetheless, Carlson does not disclose or suggest a management bus type specific to couple only to field replaceable units having a first type, or a central management agent that transmits signals to control devices. As discussed above, Larson does not disclose or suggest such features. Therefore, any combination of Carlson and Larson would also not disclose or suggest the above features. As a result, the present claims are patentable over the combination of Larson and Carlson.

Claims 22 and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Larson et al. in view of Jewett et al. (U.S. Patent No. 6,073,251). Applicants submit that the present claims are patentable over Larson even in view of Jewett.

Jewett discloses a computer system that employs multiple identical CPUs executing the same instruction stream, with multiple, identical memory modules in the address space of the CPUs storing duplicates of the same data. The system detects faults in the CPUs and memory modules, and places a faulty unit offline while continuing to operate using the good units. See Jewett at Abstract.

Nevertheless, Jewett does not disclose or suggest a management bus type specific to couple only to field replaceable units having a first type, or a central management agent that transmits signals to control devices. As discussed above, Larson does not disclose or suggest such features. Therefore, any combination of Jewett and Larson would also not disclose or

suggest the above features. As a result, the present claims are patentable over the combination of Larson and Jewett.

Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

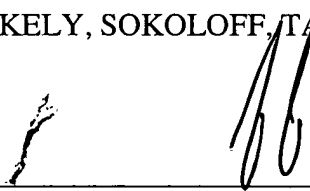
The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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